

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ETAL

MOTION FOR 20 DEPOSITION ANSWERS
18 FOR DEFENDANT LANCE SAGERS
PURSUANT TO FED R. CIV P # 30(A)(2)
IN ACCORDANCE TO THE HONORABLE JUDGE
GREGORY M. SLEET'S FEB 21, 07 ~~MEMORANDUM~~
MEMORANDUM P. 8

DATE : 3/12/07



Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

- 1.) LANCE SAGERS WHAT IS YOUR SPECIFIC ACCOUNT OF WHAT OCCURED AT THE D.P.C MITCHELL BUILDINGS DINNING HALL ON 6/14/04 AT OR ABOUT 8:00 PM ; REGARDING THE PLAINTIFF JIMMIE LEWIS
- 2.) LANCE SAGERS WHO WERE THE D.P.C PERSONEL THAT ESCORTED THE PLAINTIFF TO THE SECLUSION ROOM ON 6/14/04 AT OR ABOUT 8:00 PM
- 3.) LANCE SAGERS WHAT IS THE DISCRIPTION OF YOUR JOB DUTIES.
- 4.) LANCE SAGERS HAVE YOU EVER HAD TO UTILIZE FORCE ON A PATIENT AT THE D.P.C

5.) LANCE SAGERS WHILE DR POSTER
WAS EMPLOYED AT THE D.P.C
DATING 5/21/04 TO 6/25/04
DID SHE HAVE THE AUTHORITY
TO ORDER YOU TO UTILIZE FORCE
ON A PATIENT.

6.) LANCE SAGERS HAVE YOU EVER
FILED GRIEVANCE(S) REGARDING
THE DISCRIPTION OF YOUR JOB DUTIES
AT THE D.P.C

+

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 12TH, DAY OF MARCH,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR 20 DEPOSITION ANSWERS
1 B FOR DEFENDANT LANCE SAGERS PURSUANT
TO FED R. CIV P# 30 (A)(2) IN ACCORDANCE TO
THE HONORABLE JUDGE GREGORY M. SLEET'S FEB 21, 07
ORDER, BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
WILMINGTON, DELAWARE 19801

DATE : 3/12/07

Jimmie Lewis
SSI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ETAL

MOTION FOR LEAVE TO PROPOUND
DISCOVERY NUMBER (1A), FROM AND
FOR DEFENDANTS MOFFETT-GRAY-
SAGERS AND JOHNSON, PURSUANT TO
FED R. CIV P # 34.

DATE: 3/12/07



Jimmie Lewis
SBI# 506622
DEL. CORR. CENTER.
1181 PADDOCK RD
SMYRNA, DEL 19977

1.) THE WORK SCHEDULE DATING FROM 5/21/04 TO 6/25/04 DURING THE COURSE OF THE PLAINTIFF'S STAY AT THE D.P.C FOR THE FOLLOWING D.P.C STAFF MEMBERS WHO THE DEFENDANTS MOFFETT - GRAY - SAGERS AND JOHNSON HAVE ASSERTED WILL BE WITNESS THEY CALL FOR AND OR INTEND TO UTILIZE DURING PRE TRIAL AND OR TRIAL PROCEDURES. ~~AND DISCOVERY~~

SAID DISCOVERY IS NEEDED FOR THE PURPOSE OF DETERMINING CREDIBILITY.

SEE DEFENDANTS RESPONSE TO PLAINTIFFS MOTION FOR DISCOVERY # IV PARAGRAPH NUMBER 11.

PROVIDE WORK SCHEDULES FOR DR. SYLVIA FOSTER; DR. CHARLOTTE SELIG, NA MICHAEL ERICKSEN, RM KEN CREASEY, NURSE - HELEN HANLON, DIANE STACHOWSKI, FLORENCE S. COBB, DAVE SAXTON, CLARENCE OATES, CURTIS - CORNISH, WILLIAM EVANS, DR KATHERINE STENEMAN, AND NANCY ANDERSON.

2.) A PHOTO COPY OF THE INSURANCE POLICY THAT THE D.P.C UTILIZES AND OR WAS BEING UTILIZED FOR THE DEFENDANTS MOFFETT - GRAY - SAGERS AND JOHNSON, FOR THE PURPOSE OF DETERMINING LIABILITY; ETC. DATING FROM 5/21/04 TO 6/25/04.

3.) A PHOTO COPY OF THE DEFENDANTS MOFFETT - SAGERS - GRAY - AND JOHNSON'S D.P.C JOB CONTRACT OF EMPLOYMENT. FOR THE PURPOSE OF FACTUALLY DETERMINING THEIR JOB DESCRIPTIONS DATING FROM 5/21/04 TO 6/25/04 DURING THE COURSE OF THE PLAINTIFFS STAY AT THE D.P.C.
(NOTE : AND OR EMPLOYEE APPLICATION .)

4.) THE FACT FINDING DOCUMENT UTILIZED IN FORMING THE UNSUBSTANTIATED DECISION REGARDING THE PLAINTIFFS JUNE 20, 04 D.P.C GRIEVANCE REGARDING GRAY - MOFFETT AND SAGERS

MITCHELL BUILDINGS
5.) CLOSE OBSERVATION LOG SHEET(S)
FOR 6/14/04, NEEDED TO CONFIRM
OR DENY IF LANCE SAGERS WAS
ASSIGNED TO ONE AND OR TWO PERSON
CLOSE OBSERVATION OF ANY SPECIFIC
PATIENT AT OR ABOUT 8:00 PM

6.) A PHOTO COPY OF DUTY ASSIGNMENT
FOR ~~WINTERHURST HOSPITAL~~ SAGERS
FOR 6/14/04 AT THE D.P.C

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 12TH, DAY OF MARCH,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR LEAVE TO PROPOUND
DISCOVERY # 1A FROM AND FOR DEFENDANTS
MOFFETT - GRAY - SAGERS AND JOHNSON
PURSUANT TO FED R. CIV P# 34, BY U.S MAIL
TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DEL 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST
WILM, DEL 19801

DATE: 3/12/07

Jimmie Lewis
SB1 #506622
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SMYRNA, DEL 19977

IM: Jimmie Lewis
SBI# 506622 UNIT D42
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCK BOX 18
WILMINGTON, DELAWARE
19801

